

REMARKS

The present response is to the Office Action mailed in the above-referenced case on April 04, 2006, made final. Claims 22-33 are standing for examination. Claims 22-33 are rejected under 35 U.S.C. 103(a) as being unpatentable over Anupam et al.

("Automating Web Navigation with the WebVCR"), hereinafter Anupam, in view of Manohar et al. (U.S. 6,572,662), hereinafter Manohar and further in view of the newly presented art of Reed et al. (U.S. 6,088,717) hereinafter Reed, and Silva et al (US 6,976,210) herein Silva.

Applicant has, again, carefully studied the prior art references cited and applied by the Examiner in this case, and the Examiner's rejections and statements of the instant Office Action. In response, applicant herein argues that the art presented by the Examiner, either singly or in combination fails to teach applicant's invention, as claimed.

The Examiner states that Anupam teaches applicant's invention as disclosed in claim 22, and similarly in claim 28, with the exception of teaching recording a manual session including a plurality of Web sites. The Examiner presents the art of Manohar for teaching said limitation. The Examiner states that Manohar teaches, in the Example depicted in Figure 3, an illustration of a tour (310) that spans three web sites (320, 330, 340) over which a tour is specified (Col. 8, lines 13-23). Hence, the tour consists of content from multiple different web sites. It would have been obvious to one of ordinary skill in the art at the time of invention to combine the teachings of Anupam and Manohar as both inventions relate to web touring. The addition of the prior art of Manohar adds the feature of involving the use of multiple different web sites in the construction of a web tour.

Applicant disagrees that it would be obvious for one with skill in the art to look to Manohar for traversing a plurality of Web sites as claimed in applicant's invention. Manohar specifically teaches taking a tour of Web objects stored within a server. Manohar teaches with reference to Fig. 4 a networked computing system enhanced with a touring client (400) and a touring server (410) for network-assisted navigation of the Web shown with respect to the distribution of Web objects (A1, A2, A3, E1, B2, C1, C2, C3)

(such as Web object A1 also in a tour (420)) that happens to be distributed across multiple Web sites (401, 402, 403). Note that the tour is not a property of the collection but an object by its own right. The tour is stored in a networked database (430) and referenced and retrieved by means of an unique identifier (440) such as a URL and referred to as a tour ID (col. 8, lines 23-33).

Applicant argues that one would not look to Manohar to accomplish applicant's invention because Manohar is not truly and dynamically navigating to Web sites in the Internet domain. Manohar is merely storing Web pages and objects in a server and creating a tour for users to view the information. A viewer may possibly navigate from the server to the actual Web site on the Internet as a result of initiating a link, but Manohar fails to teach true navigation as claimed. Therefore, applicant argues, the combination of Anupam and Manohar fails to teach a manual navigation and interaction sequence comprising plurality of web sites as claimed.

The Examiner states Anupam teaches that during the recording process *data collection associated with a manual navigation and interaction sequence takes place* in that form values filled in during the recording session (in which a manual browsing session is taking place) are saved so that when the smart bookmark containing the filled in data is replayed, those values are inserted into their appropriate locations in the form.

Applicant points out that applicant's independent claims specifically recite a session recording mechanism operable by a first user for recording user Web navigation and interaction activity required for data collection. Applicant argues that Anupam teaches collecting & recording data for enabling navigation, not recording user Web navigation and interaction activity required for data collection, as claimed. Anupam clearly fails to teach data collection in the navigation process or storing and aggregating data collected in the automated sequence from the Web sites and transmitting the data back to the user, as claimed. Applicant points out that the Examiner has reconstructed applicant's limitation in order for the art to read upon it. Applicant asserts that this is not proper examining procedure as applicant's limitations should be examined in their proper construction, context and order as presented in the claim.

The Examiner states that Reed teaches applicant's claimed limitation reciting a log-in mechanism for storing log-in information for one or more second users for individual ones of the plurality of sites visited in the manual sequence. Applicant argues that there is no motivation in either Anupam, Manohar or Reed to integrate said teachings of Reed because Anupam is only capable of recording and initiating what is recorded from the first user and has no motivation for inserting log-in for a second user as claimed. Reed fails to teach inserting separate log-ins during playback of a recorded navigation session, therefore there is no motivation for the combination.

Applicant argues that without hindsight knowledge of applicant's invention there would be absolutely no motivation to make the combination espoused by the Examiner. In applicant's invention the system may not have to record duplicate navigations for each user navigating to the same Web sites, but may insert a log-in for a different user than the user being recorded.

The Examiner produces the art of Silva to create stored Web views of Web sites on a user PC to enable the user to access the Web sites in a private manner because they are stored on the user's PC. Applicant points out that the art of Silva has no bearing on the present invention as claimed because applicant provides a system recording navigation activity and the actual navigation and data access actually occurs at live Web sites on the WWW. Applicant argues that both Silva and Manohar teach storing pages, not true navigation as claimed, therefore applicant's claimed limitations are not truly taught in the art. Additionally, there is no motivation for combining the art to achieve applicant's invention because one with skill in the art would not look to art that stores Web pages for viewing to produce a system enabling automated live navigation.

Applicant therefore believes that claims 22 and 28 are now patentable over the art presented by the Examiner as argued above. Dependent claims 23-27 and 29-33 are then patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims have been shown to be patentable over the art as amended and argued above, applicant respectfully requests that this application be reconsidered, the rejections be withdrawn, and that the case be passed quickly to issue.

If any fees are due beyond fees paid with this amendment, authorization is made to deduct those fees from deposit account 50-0534. If any time extension is needed beyond any extension requested with this amendment, such extension is hereby requested.

Respectfully Submitted,
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